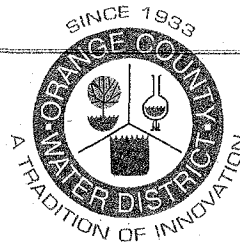


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## ORANGE COUNTY WATER DISTRICT

March 5, 2002

M60050.002775  
MCAS EL TORO  
SSIC #5090.3

Mr. Dean Gould  
BEC Marine Corps Air Station El Toro  
SWDIV Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5190

SUBJECT: Comments on Draft ROD for OU-1 and OU-2A

Dear Mr. Gould:

This letter provides the consolidated comments from Orange County Water District and Irvine Ranch Water District on the Draft Record of Decision (ROD) for Operable Units 1 and 2A for Marine Corps Air Station El Toro. Comments are as follows:

1. Page 5-4, subsection titled "Principal Aquifer": Modify second sentence as follows:  
"This is the main aquifer for irrigation groundwater supply to IRWD and the Irvine Company northwest of the Station."
2. Page 5-18, subsection titled "Carbon Tetrachloride Group": Modify second sentence to reflect the California MCL of 0.5 ug/L for carbon tetrachloride, rather than the federal MCL. The lower state MCL is a designated ARAR.
3. Page 5-25 (Table 5-3): The table should include the California MCL of 0.5 ug/L for carbon tetrachloride, in addition to, or instead of, the federal MCL.
4. Page 5-37 (Figure 5-11): The figure appears to show TDS concentration contours from two different sources, as they overlap with each other. Only one set of contours should be shown.
5. Page 6-5, bullet statements: Modify as follows: "extract and treat groundwater to develop a drinking-water supply from the principal aquifer outside the VOC plume at the following well locations . . . accept and treat for VOC removal some of the groundwater the Marine Corps/DON must remediate and use in IRWD's reclaimed water system."
6. Page 8-4, third bullet: Change "OCWD/IRWP" to "OCWD/IRWD."

7. Page 8-4, second paragraph: Modify as follows: "As a result of these meetings, OCWD/IRWD developed a new . . ."
8. Pages 8-7 (Figure 8-1), 8-21, and 10-5 (Figure 10-2): The SGU extraction well locations for recommended Alternative 10B', as conceptually shown, do not encompass the downgradient area of high VOC concentrations. It is clear from Figures 5-7 and 5-8 that VOCs exceeding 100 ug/L (see well 18\_MCAS03-2 at 140 ug/L) are flowing within the SGU beyond the station boundary toward the area of hydraulic continuity with the underlying Principal aquifer. As one of the stated remedial action objectives for Site 24 groundwater is to "prevent VOCs at concentrations above cleanup levels from migrating beyond the shallow groundwater unit" (see page 8-1), the VOC data demonstrate the need for extraction wells located near and/or downgradient of the station boundary in order to prevent VOCs from migrating into the Principal aquifer. We understand that the specific locations of the extraction wells will be evaluated and determined during the remedial design phase of the work, but we believe the conceptual locations shown in the draft ROD do not adequately characterize the locations that may be necessary to meet the stated objectives.
9. Page 8-17, Section 8.1.7, first paragraph: Modify first sentence as follows: "Alternative 8A is a relatively new alternative developed by OCWD/IRWD in 1999 after . . ."
10. Page 8-27 (Figure 8-5): The proposed locations of new monitoring wells should be modified or augmented as necessary to adequately monitor the performance of the SGU extraction wells in preventing movement of the VOCs from the SGU to the Principal aquifer off station. Figure 8-5, as shown, shows the conceptual SGU monitoring well network as inadequately covering the downgradient extent of the elevated VOC concentrations (e.g., < 50 ug/L) in the SGU. This figure should be modified to conform to the stated remedial action objectives and SGU plume extent, as discussed in Comment No. 8 above.
11. Page 9-4 (Table 9-2): Include footnote "c" referring to the 95-year cleanup time for Alternative 8A. Footnote "c" should be the same as that shown in Table 3 of the OU-1/2A Proposed Plan, which states, "Computer modeling shows that Alternative 8A is the most effective alternative during the first 20 years of operation at removing the initial mass of VOC contamination. By further optimizing the well placement of the extraction wells in the remedial design phase, remediation time may be significantly shortened."
12. Page 10-1, Section 10.1: Modify first paragraph, beginning with the second sentence, as follows: "Groundwater is extracted from ~~these wells~~ ET-1 and ET-2 and conveyed to the IDP treatment plant where it is treated to remove VOCs (CERCLA treatment) and reduce

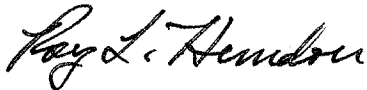
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dissolved solids (non-CERCLA treatment). The treated groundwater is then distributed for nonpotable uses. Initial extractions from Well 78 will be conveyed to IRWD's nonpotable water system. If VOCs exceed the MCL in this well, extracted water will be conveyed to the IDP treatment plant for VOC removal.

13. Page 10-2, last bullet in Section 10.2 should read: "DON's pumping and pipeline conveyance from those extraction wells to the IDP nonpotable pipeline feedwater conveyance system's point of connection at the Former MCAS El Toro boundary."
14. Page 10-8, second paragraph: Modify second sentence as follows: "This water will be conveyed to the IDP treatment plant via a separate conveyance line for treatment to remove dissolved solids and nitrate~~low concentrations of VOCs.~~"
15. Page 10-8, Section 10.4, first paragraph: Modify second sentence as follows: "The DON, DOJ, OCWD, and IRWD have reached . . ."

We appreciate the opportunity to provide these comments to you. OCWD and IRWD support the selected remedy and are committed to implementing the Irvine Desalter Project. Please contact me at (714) 378-3260 or email at [rherndon@ocwd.com](mailto:rherndon@ocwd.com) if you have any questions. You may also contact Richard Bell at IRWD at (949)-453-5582 or by email at [bell@irwd.com](mailto:bell@irwd.com).

Sincerely,



Roy L. Herndon  
District Hydrogeologist

cc: Steve Conklin, OCWD  
Richard Bell, IRWD  
Nicole Moutoux, USEPA  
Triss Chesney, DTSC  
Patricia Hannon, Santa Ana RWQCB